

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION

THIS DOCUMENT RELATES TO:

TRACK THREE

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

**CVS'S PROPOSED LIMITING INSTRUCTION ON  
CORPORATE-LEVEL PROGRAMS AND SYSTEMS**

In light of the deposition testimony from CVS employee Michelle Travassos that plaintiffs currently are playing, CVS requests that the following limiting instruction be given to the jury:

You are hearing testimony from a CVS witness, Michelle Travassos, about certain programs and systems that CVS has implemented at the corporate level, or that CVS explored implementing at the corporate level, to monitor its pharmacies, to review and/or suspend prescribers, and to employ computer alerts. You are instructed that these programs and systems are not required by law.

Dated: October 25, 2021

Respectfully submitted,

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